

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, JOHN DOE, and THOMAS
BAKER,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

STIPULATIONS OF FACT AND AUTHENTICATION OF DOCUMENTS

Pursuant to Plaintiffs' request, and with the agreement of Defendant James A. Fields Jr. through his counsel, Defendant Fields hereby stipulates that the facts described below are true and accurate, and that the documents identified below are authentic pursuant to Rule 901 of the Federal Rules of Evidence. Defendant Fields may object to the admission of any such documents into evidence on grounds other than authenticity, including relevance and materiality.

The following facts are stipulated to be true and accurate, and the following documents are stipulated to be authentic:

1. DOJ00007916 through DOJ00008450 are true and accurate copies of Instagram business records for Defendant Fields' Instagram account "thebigboss1337."
2. Defendant Fields was the only known user of the Instagram account "thebigboss1337."

3. DOJ00007923 through DOJ00007983 are true and accurate copies of Instagram business records containing photographs and text posted by the Instagram account “thebigboss1337” with corresponding metadata.

4. DOJ00007983 through DOJ00007991 are true and accurate copies of Instagram business records containing Profile Picture comments posted by the Instagram account “thebigboss1337” with corresponding metadata.

5. DOJ00007991 through DOJ00008089 are true and accurate copies of Instagram business records containing Direct Shares sent by the Instagram account “thebigboss1337” with corresponding metadata.

6. Defendant Fields was the only known user of the Twitter account @azrielLevy.

7. Defendant Fields was the only known user of the email address goyundercover@mail.com.

8. DOJ00000054 is a true and accurate copy of a Twitter business record identifying the IP address used to create the Twitter account “@azrielLevy.”

9. DOJ00000063 is a true and accurate copy of a Twitter business record containing the profile “bio” for Defendant Fields’s Twitter account “@azrielLevy.”

10. DOJ00000078 is a true and accurate copy of a Twitter business record containing basic subscriber information for Defendant Fields’s Twitter account “@azrielLevy.”

11. DOJ00001823 through DOJ00001853 are true and accurate copies of Twitter business records containing tweets sent by the Twitter account “@azrielLevy.”

12. DOJ00000050 is a true and accurate copy of a Twitter business record identifying account numbers of Twitter accounts that followed Defendant Fields’s Twitter account “@azrielLevy.”

13. DOJ00000077 is a true and accurate copy of a Twitter business record containing account numbers of Twitter accounts that followed the Twitter account “@azrielLevy.”

14. DOJ00000107 and DOJ00002221 are true and accurate copies of Twitter business records containing the profile image and header image for Defendant Fields’s Twitter account “@azrielLevy.”

15. Defendant Fields was the only known user of the Twitter account “@TheRealGiantDad.”

16. DOJ00000056 is a true and accurate copy of a Twitter business record identifying the IP address used to create the Twitter account “@TheRealGiantDad.”

17. DOJ00000065 is a true and accurate copy of a Twitter business record containing the profile “bio” for Defendant Fields’s Twitter account “@TheRealGiantDad.”

18. DOJ00000080 is a true and accurate copy of a Twitter business record identifying the basic subscriber information for Defendant Fields’s Twitter account “@TheRealGiantDad.”

19. DOJ00005615 through DOJ00005916 are true and accurate copies of Twitter business records containing tweets sent by the Twitter account “@TheRealGiantDad.”

20. DOJ00000219 through DOJ0000226 are true and accurate copies of Twitter business records containing direct messages sent to and received by the Twitter account “@TheRealGiantDad.” Direct messages with a “sender id” of 836744285038981120 were sent from the Twitter account “@TheRealGiantDad.” Direct messages with a “recipient id” of 836744285038981120 were received at the Twitter account “@TheRealGiantDad.”

21. DOJ00000098 through DOJ00000100 are true and accurate copies of Twitter business records identifying account numbers of Twitter accounts that followed the Twitter account “@TheRealGiantDad.”

22. DOJ00000095 through DOJ00000097 are true and accurate copies of Twitter business records identifying account numbers of Twitter accounts that followed the Twitter account “@TheRealGiantDad.”

23. DOJ00000122 and DOJ00000721 are true and accurate copies of Twitter business records containing the profile image and header image for Defendant Fields’s Twitter account “@TheRealGiantDad.”

24. DOJ00000327, DOJ00000405, DOJ00000687, DOJ00000698, DOJ00000700, DOJ00000822, DOJ00001203, DOJ00001353, DOJ00001430, DOJ00001576, DOJ00001758, DOJ00001762, DOJ00001893, DOJ00002181, DOJ00002350, DOJ00002818, DOJ00002958, DOJ00002970, DOJ00003096, DOJ00003145, DOJ00003146, DOJ00003532, DOJ00003756, DOJ00003761, DOJ00003961, DOJ00004146, DOJ00004613, DOJ00004614, DOJ00004630, DOJ00005080, DOJ00005088, DOJ00005245, DOJ00005277, DOJ00005312, DOJ00005365, DOJ00005366, DOJ00005417, DOJ00005525, DOJ00005567, DOJ00005582, DOJ00005602, DOJ00006258, DOJ00006935, DOJ00006937, DOJ00000330, and DOJ00001548 are true and accurate copies of Twitter business records containing photographs, gifs, and videos tweeted by the Twitter account “@TheRealGiantDad.”

25. DOJ00000812, DOJ00000819, DOJ00000821, DOJ00001122, DOJ00001232, DOJ00001447, DOJ00001577, DOJ00002161, DOJ00003732, DOJ00003733, DOJ00003763, DOJ00005077, DOJ00005345, DOJ00005411, and DOJ00005611 are true and accurate copies of Twitter business records containing photographs, gifs, and videos sent via direct message from the Twitter account “@TheRealGiantDad.”

26. Defendant Fields was the only known user of the Twitter account “@TheNewGiantDad.”

27. DOJ00000053 is a true and accurate copy of a Twitter business record identifying the IP address used to create the account “@TheNewGiantDad.”

28. DOJ00000051 is a true and accurate copy of a Twitter business record containing the profile “bio” for Defendant Fields’s Twitter account “@TheNewGiantDad.”

29. DOJ00000079 is a true and accurate copy of a Twitter business record identifying the basic subscriber information for Defendant Fields’s Twitter account “@TheNewGiantDad.”

30. DOJ00000830 through DOJ00000853 are true and accurate copies of Twitter business records identifying the IP addresses used to access the Twitter account “@TheNewGiantDad.”

31. DOJ00006273 through DOJ00006807 are true and accurate copies of Twitter business records containing tweets sent from the Twitter account “@TheNewGiantDad.”

32. DOJ00005089 through DOJ00005208 are true and accurate copies of Twitter business records containing direct messages sent to and received by the Twitter account “@TheNewGiantDad.” Direct messages with a “sender id” of 844482580896514053 were sent from the Twitter account “@TheNewGiantDad.” Direct messages with a “recipient id” of 844482580896514053 were received at the Twitter account “@TheNewGiantDad.”

33. DOJ00000203 through DOJ00000214 are true and accurate copies of Twitter business records identifying account numbers of Twitter accounts that followed the Twitter account “@TheNewGiantDad.”

34. DOJ00000153 through DOJ00000158 are true and accurate copies of Twitter business records identifying account numbers of Twitter accounts that followed the Twitter account “@TheNewGiantDad.”

35. DOJ00000104 and DOJ00000766 are true and accurate copies of Twitter business records containing the profile image and header image for Defendant Fields's Twitter account "@TheNewGiantDad."

36. DOJ00000281, DOJ00000369, DOJ00000585, DOJ00000741, DOJ00000857, DOJ00000870, DOJ00000882, DOJ00000955, DOJ00001021, DOJ00001224, DOJ00001225, DOJ00001282, DOJ00001629, DOJ00001737, DOJ00002026, DOJ00002294, DOJ00002357, DOJ00002513, DOJ00002565, DOJ00002566, DOJ00002574, DOJ00002620, DOJ00002808, DOJ00002809, DOJ00002813, DOJ00002936, DOJ00003071, DOJ00003095, DOJ00003097, DOJ00003182, DOJ00003210, DOJ00003221, DOJ00003222, DOJ00003223, DOJ00003268, DOJ00003375, DOJ00003412, DOJ00003427, DOJ00003457, DOJ00003458, DOJ00003484, DOJ00003578, DOJ00003695, DOJ00003735, DOJ00003741, DOJ00003764, DOJ00003765, DOJ00003776, DOJ00003778, DOJ00003855, DOJ00003856, DOJ00003887, DOJ00003929, DOJ00003936, DOJ00004000, DOJ00004006, DOJ00004009, DOJ00004013, DOJ00004145, DOJ00004147, DOJ00004148, DOJ00004165, DOJ00004192, DOJ00004193, DOJ00004198, DOJ00004309, DOJ00004310, DOJ00004429, DOJ00004575, DOJ00004710, DOJ00004736, DOJ00004787, DOJ00005079, DOJ00005268, DOJ00005311, DOJ00005314, DOJ00005333, DOJ00005343, DOJ00005344, DOJ00005358, DOJ00005415, DOJ00005416, DOJ00005432, DOJ00005438, DOJ00005493, DOJ00005598, DOJ00005599, DOJ00005600, DOJ00005605, DOJ00005609, DOJ00006163, DOJ00006164, DOJ00006211, DOJ00006844, DOJ00006919, DOJ00006931, DOJ00006932, DOJ00006934, DOJ00006936, DOJ00006938, DOJ00006939, DOJ00006968, DOJ00001958, DOJ00003959, DOJ00004001, DOJ00004814, DOJ00005356, DOJ00005560, and DOJ00005610 are true and accurate copies of Twitter business records containing photographs, gifs, and videos tweeted by the Twitter account "@TheNewGiantDad."

37. DOJ00000184, DOJ00000326, DOJ00000666, DOJ00000725, DOJ00000728, DOJ00000731, DOJ00000809, DOJ00000985, DOJ00001223, DOJ00001226, DOJ00001271, DOJ00001535, DOJ00001641, DOJ00001659, DOJ00002107, DOJ00002220, DOJ00002349, DOJ00002367, DOJ00002457, DOJ00002556, DOJ00002905, DOJ00003070, DOJ00003734, DOJ00003736, DOJ00003762, DOJ00003777, DOJ00004303, DOJ00004347, DOJ00004401, DOJ00004605, DOJ00004720, DOJ00005076, DOJ00005422, DOJ00005516, DOJ00005517, DOJ00005581, DOJ00005604, DOJ00005608, DOJ00006847, DOJ00000820, and DOJ00004574 are true and accurate copies of Twitter business records containing photographs, gifs, and videos sent via direct message from the Twitter account “@TheNewGiantDad.”

38. DOJ00000323, DOJ00000329, DOJ00000348, DOJ00000406, DOJ00000699, DOJ00002043, DOJ00002621, DOJ00002729, DOJ00003150, DOJ00003254, DOJ00003363, DOJ00003369, DOJ00003376, DOJ00003917, DOJ00003960, DOJ00004008, DOJ00004199, DOJ00004492, DOJ00005210, DOJ00005233, DOJ00005357, and DOJ00005603 are true and accurate copies of Twitter business records containing photographs, gifs, and videos received via direct message at the Twitter account “@TheNewGiantDad.”

39. Defendant Fields followed David Duke on Twitter.

40. Defendant Fields followed co-defendant Richard Spencer on Twitter.

41. Defendant Fields followed co-defendant Augustus Sol Invictus on Twitter.

42. Defendant Fields followed co-defendant Michael Peinovich on Twitter.

43. Defendant Fields followed the Twitter account @AndrewQuackson.

44. DOJ00010957 through DOJ00017007 are true and accurate copies of Facebook business records for Defendant Fields’s Facebook account “Conscious Ovis Aries.”

45. Defendant Fields was the only known user of the Facebook account “Conscious Ovis Aries.”

46. DOJ00011203 through DOJ00011217 are true and accurate copies of Facebook business records containing the “Minifeed” of Defendant Fields’s Facebook account, “Conscious Ovis Aries.”

47. DOJ00011218 through DOJ00011526 are true and accurate copies of Facebook business records containing the “Activity Log” of Defendant Fields’s Facebook account, “Conscious Ovis Aries.”

48. DOJ00011890 through DOJ00012156 are true and accurate copies of Facebook business records containing “Unified Messages” sent to and received by the Facebook account, “Conscious Ovis Aires.” “Unified Messages” were sent from the Facebook account “Conscious Ovis Aries” where the “Author” is listed as “Conscious Ovis Aries (100000477990126).” “Unified Messages” were received at the Facebook account “Conscious Ovis Aries” where the “Author” is listed as another Facebook user.

49. DOJ00017008 is a true and accurate copy of a Samsung Extraction Report reflecting data extracted from Defendant Fields’s cell phone, including incoming and outgoing text messages, incoming and outgoing calls, photos, and internet searches.

50. DOJ00006977 is a true and accurate copy of a Cellebrite Extraction Report reflecting data extracted from Defendant Fields’s cell phone, including incoming and outgoing text messages, incoming and outgoing calls, photos, and internet searches.

51. Defendant Fields was the only known user of the email address volkeril@outlook.com.

52. DOJ00001079 is a true and accurate copy of an email from Discord sent the email address volkeril@outlook.com.

53. Defendant Fields was the only known user of a Discord account named “Volker9744.”

54. DOJ00006170 is a true and accurate copy of a Discord business record containing true and accurate the information related to the Discord account named “Volker9744.”

55. DOJ00000081 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

56. DOJ00000087 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

57. DOJ00000088 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

58. DOJ00000123 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

59. DOJ00000127 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

60. DOJ00000128 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

61. DOJ00000184 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

62. DOJ00000188 is a true and accurate copy of a picture saved on Defendant Fields’s home computer.

63. DOJ00000248 is a true and accurate copy of a picture saved on Defendant Fields's home computer.

64. DOJ00000285 is a true and accurate copy of a picture saved on Defendant Fields's home computer.

65. DOJ00001353 is a true and accurate copy of a picture saved on Defendant Fields's home computer.

66. DOJ00006918 is a true and accurate copy of a picture saved on Defendant Fields's home computer.

67. DOJ00006942 is a true and accurate copy of a picture saved on Defendant Fields's home computer.

68. DOJ00000520 is a true and accurate copy of a Google business record containing the profile information from Defendant Fields's account with the account name "derschwarzesonne" and the username "Volker Krieger."

69. DOJ00006192 is a true and accurate copy of a post by Defendant Fields from his Google account.

70. DOJ00010933 is a true and accurate copy of a picture saved to Defendant Fields's Google account.

71. DOJ00010939 is a true and accurate copy of a picture saved to Defendant Fields's Google account.

72. 318cr1100000353 is a true and accurate photograph depicting Defendant Fields's bedroom on August 13, 2017.

73. 318cr1100001043 is a true and accurate video depicting Defendant Fields's car on August 12, 2017.

74. City_00011613 is a true and accurate audio-recording of a telephone call involving Defendant Fields on February 12, 2018.

75. City_00011614 is a true and accurate audio-recording of a telephone call involving Defendant Fields on February 13, 2018.

76. City_00033058 is a true and accurate copy of a text message conversation between Defendant Fields and Samantha Bloom on August 11, 2017, excerpted from the Cellebrite Extraction Report of Defendant Fields's phone.

Dated: June 24, 2021

Respectfully submitted,

/s/ David L. Campbell

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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Damigo, and Identity Europa, Inc. (Identity Evropa)*

I hereby certify that on June 24, 2021, I also served the foregoing upon following *pro se* defendants, via electronic mail, as follows:

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matthew.w.heimbach@gmail.com

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I hereby certify that on June 24, 2021, I also served the foregoing upon following *pro se* defendant, via first class mail, as follows:

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Christopher Cantwell 00991-509
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P.O. Box 1000
Marion, IL 62959

/s/ Joshua M. Siegel

Joshua M. Siegel (VSB 73416)

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